



February 23, 2015

Ms. Chris Jump  
U.S. Environmental Protection Agency  
Region VII  
901 North 5th Street  
Kansas City, Kansas 66101

**RE: Fourth Quarter 2014 Progress Report  
Clean Harbors Kansas, LLC  
2549 New York Street, Wichita, Kansas  
EPA Identification No: KSD007246846**

RCRA



Dear Ms. Jump;

As required by the Clean Harbors Kansas, LLC HSWA, Part II RCRA Permit, Conditions III.S.1. – 6., Clean Harbors Kansas, LLC (Clean Harbors) is providing this quarterly summary progress report covering activities that occurred during the Fourth Quarter 2014. The activities summarized in this report have been conducted pursuant to the corrective action provisions of Permit Condition III. This progress report contains information to comply with following permit conditions:

- III.S.1. A description of all work completed during Fourth Quarter 2014.
- III.S.2. A summary of all findings, including summaries of laboratory data.
- III.S.3. A summary of all problems or potential problems encountered during the reporting period.
- III.S.4. Deviations from the approved work plan(s), SAP's.
- III.S.5. Projected work for the First Quarter 2015 and,
- III.S.6. Any instances of noncompliance with the Part II Permit not otherwise required to be reported pursuant to Part II Permit Conditions II.E.11 and II.E.16.

III.S.1 During the Fourth Quarter 2014 the following work was completed at the Clean Harbors Kansas Facility.

Excavation of the areas on the eastern side of the property (Phases I and II of the IRM) were completed during 4<sup>th</sup> quarter 2014. The only exception to this is a small area of the Northeastern Corner excavation where the initial excavation activities did not extend deep enough to remove all soil impacted at levels exceeding IAOs. EPA's concerns were transmitted to Clean Harbors via email on October 22, 2014. Clean Harbors responded with a plan to re-excavate this



area which was approved by EPA, with some modifications. The re-excavation of the Northeastern Corner area will be completed during First Quarter 2015.

Excavation of impacted soils within the Phase III and IV areas of the Site was continued during fourth quarter 2014. A figure depicting the extent of the excavation work as of December 31, 2014 is attached. Phase III and IV areas that were excavated included:

- Trailer Parking Area – The excavation of this area proceeded as described in the IRM workplan. All confirmation soil samples were below IAOs and the excavation was backfilled upon receipt of results.
- Building B – Under slab soil samples were collected in October 2014 to determine if the concrete floors were suitable for re-use as backfill. The results of these under slab samples resulted in the majority of the floor of Building B being designated for disposal as hazardous at Lone Mountain. An additional 2.5 feet of soil beneath the floor slab was excavated and shipped to Lone Mountain for disposal. Additional excavation of the Building B area is to be performed during first quarter 2015.
- Southwestern Fence Line Area – The portion of the southwestern fence line excavation area on the Clean Harbors property was excavated per the work plan and all confirmation soil sample results were below IAOs. The southern portion of this excavation that lies on the former Coastal Derby refinery will be completed during first quarter 2015.
- Building D – Demolition of Building D was completed during 4<sup>th</sup> quarter 2014 and excavation of impacted soils was initiated. During demolition, four pipes that appeared to be roof downspouts were discovered extending approximately 15 feet below ground surface. These downspouts and the soil surrounding them was excavated in accordance with the work plan. The majority of the concrete floor within Building D was disposed of as hazardous waste at Lone Mountain following review of under slab samples collected in areas that were previously not sampled. The Building D excavation was extended southward until a point where a water main was encountered running through the center of the property. As this water line could not be relocated, soils in the immediate vicinity of the line were not excavated on either the northern or southern side of the line. Additional excavation of the Building D area will be performed during first quarter 2015.
- Processing Area – Excavation of the process area was initiated during fourth quarter 2014 and proceeded as described in the work plan. Buried drums were discovered in the northeastern portion of the





Processing Area excavation. These drums were left in place to facilitate vehicle traffic to the western portion of the property and will be removed during first quarter 2015.

Clean Harbors submitted a request to the EPA on October 21, 2014 to restrict the confirmation sampling list to only VOCs and metals (in those areas where metal concentrations exceeded IAOs). This request was made in response to KDHE's decision to not consider any of the confirmation sampling data collected during the course of the IRM in any future site closure decisions. EPA approved this request via email on October 22, 2014.

Chris Jump communicated concerns related to site activities stemming from a November 6, 2014 site visit. Clean Harbors responded to these concerns in an email dated November 24, 2014.

EPA provided preliminary comments to the Human Health Risk Assessment via email on December 12, 2014. These comments will be discussed further in a conference call scheduled for February 24, 2015.

#### III.S.2. A summary of all findings, including summaries of laboratory data.

The attached figure depicts the excavation extent as of December 31, 2014. Summaries of analytical data are currently being prepared and will be transmitted to EPA for review during first quarter 2015.

#### III.S.3. A summary of all problems or potential problems encountered during the reporting period.

Buried drums were discovered in the western portion of the Processing Area excavation during fourth quarter 2014. These drums and surrounding soils will be excavated once an alternate truck route to the western portion of the site is established (expected first quarter 2015).

#### III.S.4. Deviations from the approved work plan(s), SAP's

Excavation of soil in close proximity to the water line running in an east west direction through the center of the property was not possible. Samples were collected on both the north and south sides of the water line to characterize residual concentrations in close proximity to the water line. Significant expansion of individual excavation areas was performed in response to confirmation soil sample results, however this was performed according to procedures described in the work plan.



III.S.5. Projected Work for the First Quarter 2015:

Excavation of all remaining areas will be completed during first quarter 2015.

Confirmatory soil sampling results will be forwarded to EPA for review as soon as possible once the excavations are completed.

All excavations will be backfilled and restored during first quarter 2015.

Resolution of EPAs preliminary comments on the HHRA will occur during first quarter 2015.

III.S.6. Any instances of noncompliance with the Part II Permit not otherwise required to be reported pursuant to Part II Permit Conditions II.E.11 and II.E.16.

No instances of non-compliance were reported or encountered during the reporting period.

Please do not hesitate to contact me with any questions regarding this report. I can be reached at 510-777-1864 (e-mail: [mstephenson@cameron-cole.com](mailto:mstephenson@cameron-cole.com)).

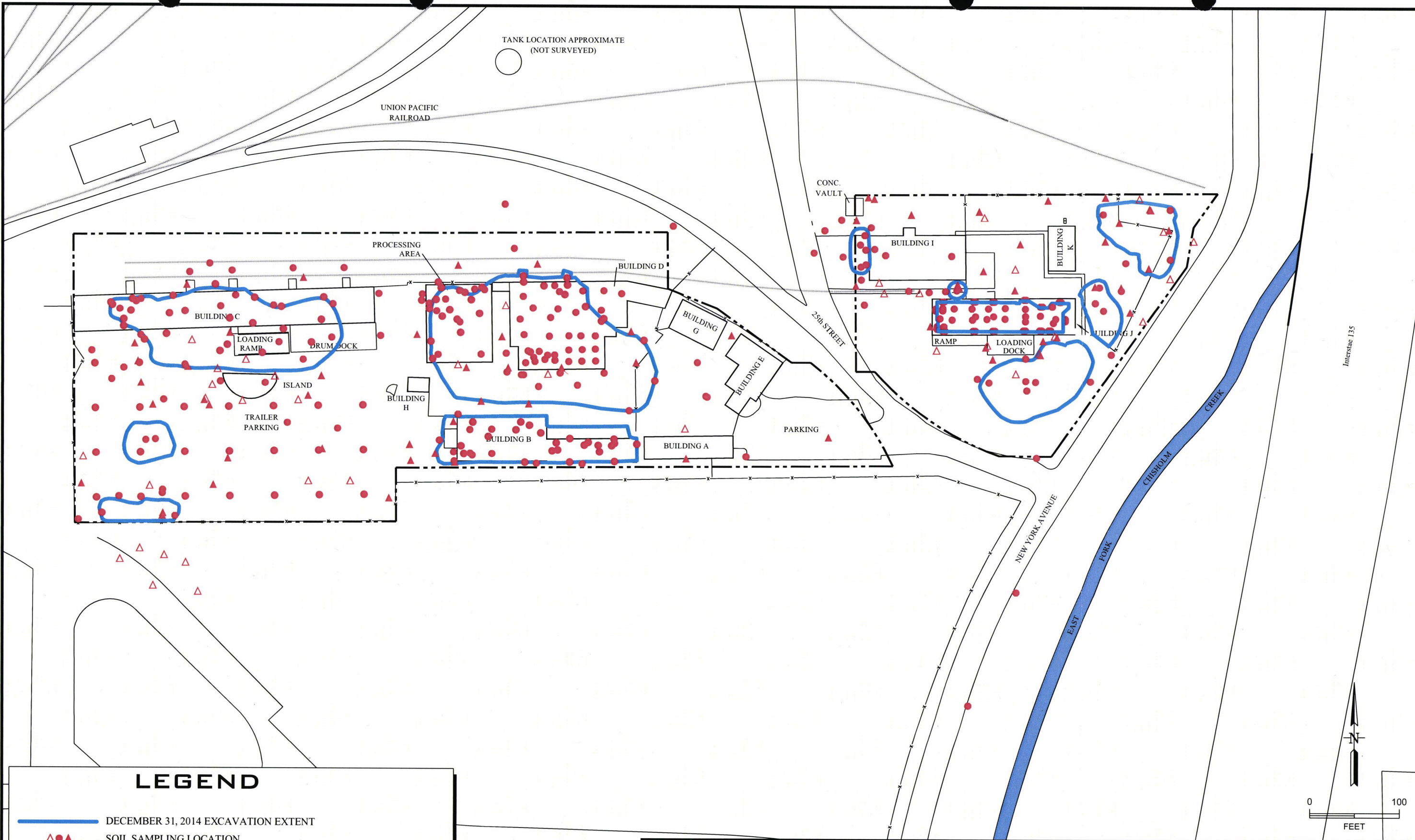
Sincerely,

Mike Stephenson  
Principal Scientist

cc: John Cook, KDHE  
Akhter Hossain, KDHE  
Mustafa Kamal, KDHE  
Martin Smith, Clean Harbors  
Lon Stewart, Clean Harbors




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# LEGEND

- DECEMBER 31, 2014 EXCAVATION EXTENT
- SOIL SAMPLING LOCATION
- RAILROAD TRACKS
- FENCE
- FACILITY BOUNDARY (NOT SURVEYED)

	BY	DATE
DRAWN	FR	02/11/15
CHECKED		
REVISED		
APPROVED		
APPROVED		
APPROVED		

 **Cameron-Cole**  
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**FIGURE 3**  
**EXCAVATION EXTENT DECEMBER 31, 2014**  
**CLEAN HARBORS WICHITA**

SCALE:	AS SHOWN	PROJECT:	1808
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